

# **EXHIBIT A**

# CIPRIANI & WERNER

A PROFESSIONAL CORPORATION

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March 4, 2021

**Via E-Mail To:**

Marlene Goldenberg  
Goldenberg Law, PLLC  
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**RE: *In re Valsartan, Losartan and Irbesartan Products Liability Litigation,*  
U.S. District Court, District of New Jersey, Camden Division,  
No. 1:19-md-02875**

Dear Mrs. Goldenberg:

I write with respect to the Court's ruling during the February Case Management Conference regarding production of custodial files from Aurobindo Pharma Ltd. We have been working diligently to collect the custodial files and process them for review. We currently have 7 custodial files. All have been processed for review. After we ran the search terms and applied email threading, we learned that there are approximately 1,127,000 documents to be reviewed. We have over 80 attorneys currently reviewing documents and will likely have to add more. I anticipate that the remaining custodial files will yield the same, if not more, number of documents to be reviewed. The Court's deadlines of March 12<sup>th</sup> and March 19<sup>th</sup> have imposed an enormous burden on Aurobindo. I write to request that Plaintiffs agree to a roll-out production.

Below, please find a proposal based on the custodial files that have been collected so far, the number of documents to be reviewed, the anticipated number of documents in the custodial files that are still being collected, the revised deposition schedule, and the case management deadlines in CMO-23. During the conference, Plaintiffs stated that they might be willing to move some depositions back to accommodate the production schedule and are willing to prioritize certain custodians. The first fact witness deposition is scheduled for March 19. The first 30(b)(6) witness is scheduled for April 15<sup>th</sup>. We propose rolling deadlines between March 12 and April 30. I believe the current deposition schedule works with our proposal, but we can discuss new dates if Plaintiffs prefer to do so. Kindly let me know when you are available to meet and confer.

Proposed Production Deadline	Custodians
March 12	Dr. Srinivas K. Rama; Mr. Sarath kumar Kamavarapu; and Mr. M V Rama Krishna.

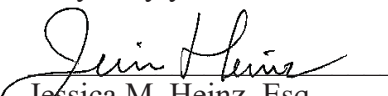
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March 19	Mr. Sanjay Singh; Mr. Mallikarjuna Reddy Kurre; and Mr. Pravat Kumar Tripathy.
April 1	Mr. Mahesh B. Shinde; and Mr. Hanumanthu Penchalaiah,
April 15	MV Subba Raju; T Rajasekhar Reddy; and P. Sateesh Kumar.
April 30	GV Srinivasa Sudhakar Varma; N Somasundaram; A Srinivasa Reddy; R Srinivasa Rao; A Srikanth; and Individual(s) charged with the following during the relevant time period: 1. Contracting with Lantech; 2. Conducting due diligence on Lantech in terms of quality and cGMP compliance; 3. Providing Lantech with specifications for the use, recovery, recycling, and cleaning of the solvents used in the manufacture of Aurobindo's VCDs; and 4. Investigating any cGMP, contamination, or NDMA issues with Lantech.

Kindly recall that Special Master Vanaskie instructed the parties that "we'll continue to be flexible with respect to the burden that [the ruling] may impose." (Transcript from the February 24 Conference, 46:2-4). Given that the Court has yet to enter an Order, I believe a proposed stipulated order modifying Special Master Vanaskie's ruling would be appropriate. If Plaintiffs will agree to modify the deadlines, I would suggest the Parties include any revised schedule in the proposed Stipulation that I sent previously regarding preservation of jurisdictional defenses and APL's approved list of custodians.

Thank you.

Very truly yours,

  
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Jessica M. Heinz, Esq.

Cc: Ruben Honik  
Andrew Obergfell  
Ashleigh Raso  
Daniel Nigh  
Ben Stellpflug